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Environment & Natural Resources Division  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA, BILLINGS DIVISION

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FIDELITY EXPLORATION & PRODUCTION CO.,	)	No. 1:16-cv-00167- SPW-TJC
	)	
Plaintiff,	)	Judge Susan P. Watters
	)	Magistrate Timothy J.
v.	)	Cavan
	)	
RYAN ZINKE <sup>1</sup> , in his official capacity as	)	<b>DEFENDANTS'</b>
Secretary of the Interior of the United States of	)	<b>RESPONSE TO</b>
America;	)	<b>PLAINTIFF'</b>
JON K. RABY, in his official capacity as	)	<b>ADDITIONAL FACTS</b>
Montana/Dakotas State Director, Bureau of	)	
Land Management;	)	
UNITED STATES DEPARTMENT OF THE	)	
INTERIOR, an agency of the United States	)	
Government; and	)	
BUREAU OF LAND MANAGEMENT, an	)	
agency of the United States Government,	)	
	)	
Defendants.	)	
	)	

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<sup>1</sup> Ryan Zinke now serves as Secretary of the Interior, and is automatically substituted pursuant to Fed. R. Civ. P. 25(d).

**Verbatim Response to Plaintiff's Additional Facts:**

44. Over twenty BLM Officials and experts were involved in the approval of the PODs and the corresponding environmental studies, including, but not limited to the following:

<b>Employee:</b>	<b>Position:</b>
David McIlnay	Field Manager
David Jaynes	Assistant Field Manager
Dale Tribby	Supervisory Natural Resource Specialist
Randy Nordsven	Mineral Resources Specialist
Jim Albano	Mineral Resources Specialist
Jackie Anderson	Land Law Examiner
Andy Bobst	Hydrologist
David Breisch	Mineral Resource Specialist
Susan Caplan	Physical Scientist
Scott Haight	Geologist
Ed Hughes	Economics
Bernice Knopp	Land Law Examiner
Chuck Laasko	Petroleum Engineer
Krista Madsen	Staff Assistant
Doug Melton	Archeologist

Robert Mitchell	Soil Scientist
Robert McVey	Petroleum Engineer
Larry Rau	Wildlife Biologist
Joan Trent	Sociologist
Pam Wall	Realty Specialist
Brenda Witkowski	Natural Resource Specialist
Dan Benoit	Geologist
Dawn Doran	Rangeland Mineral Specialist
Mary Bloom	Environmental Coordinator

(R. at DOI-001394, 1946, 1947, 1987, 2019).

*Undisputed as to the individuals, although Defendants note that these individual's official titles may differ somewhat from those listed herein.*

DATED: July 13, 2018.

JEFFREY H. WOOD  
Acting Assistant Attorney General

/s/ Joseph H. Kim  
JOSEPH H. KIM  
Trial Attorney  
U.S. Department of Justice  
Environment & Natural Resources Division  
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ATTORNEYS FOR FEDERAL  
DEFENDANTS

Of Counsel:

Robert C. Eaton  
Senior Attorney  
Office of the Regional Solicitor  
Rocky Mountain Region  
U.S. Department of the Interior  
Lakewood, Colorado